

server. The HTTP path name is transmitted from the client to the server, and the server determines whether the path name includes the identity of the container. If so, the HTTP path name is processed to retrieve the administrative data from the server, and returned to the client. Thus, the claimed invention provides a protocol that enables server administrative data, e.g. real-time operating statistics, configuration options and other information about the state of the server, to be remotely obtained without adversely affecting server resources.

The *Dillingham* patent was apparently cited for its disclosure of the use of HTTP requests to interact with a server. However, the type of interaction contemplated in the *Dillingham* patent is distinctly different from the subject matter of the rejected claims.

More particularly, as disclosed in its background portion, the *Dillingham* patent is directed to the ability to configure web site directories from a remote client, over the internet. Referring to column 1, lines 55-59, for example, the patent states that there was no ability to remotely browse a server's physical files and directories, i.e., to determine what physical files and directories are located on a web server. The *Dillingham* patent discloses a technique that allows a web site administrator to remotely browse the directories over the Internet. In other words, it enables the administrator to *discover* what directories and files exist on the web server.

Claim 4 recites the step of generating, at the client, an HTTP path name "having an identity of a container within the server..." It is respectfully submitted that the *Dillingham* patent does not disclose this claimed feature. In fact, the problem addressed by the *Dillingham* patent is that the web site administrator *does not know* what physical files and directories are located on the web site server. If the

administrator does not know the identity of a container, e.g. a directory, it is not possible to generate an HTTP path name having the identity of a container within the server, specifically one that contains administrative data about the server.

In rejecting claim 4, the Office Action alleges that the *Dillingham* patent discloses an HTTP path name with an identity of a container within the server, with reference to column 2, lines 47-50 and column 7, lines 55-56. However, these portions of the patent do not suggest that an HTTP path name is generated *at the client* that includes an identity of a container within the server. Rather, they disclose that, once it receives a client request, the *server* enumerates the files and folders for a path specified in the client request. Thus, in the claimed method, the client sends an HTTP communication to the server that specifically identifies a container within the server. In contrast, in the *Dillingham* patent, the client does not know about the existence of the containers within the server, and therefore sends a request to the server asking to be informed about them.

Another step recited in claim 4 is that of determining at the server whether the HTTP path name includes the identity of the container of the server. In light of the distinction noted above, it is apparent that the *Dillingham* patent does not disclose this claimed step. Specifically, the server does not determine whether the HTTP path name includes the identity of a particular container, e.g. directory or folder. Rather, the server recognizes the HTTP message as a request to provide information about the files or directories in the path specified by the request.

For at least the foregoing reasons, therefore, it is respectfully submitted that the *Dillingham* patent does not suggest the subject matter of claim 4 to a person of

ordinary skill in the art. For similar reasons, the subject matter of independent claims 11 and 18 is likewise not suggested.

Claim 8 recites that the administrative data that is retrieved by the server and returned to the client comprises a snapshot of prescribed values. Similar subject matter is recited in claim 15. The rejection of these claims acknowledges that the *Dillingham* patent does not disclose such subject matter, and therefore relies upon the teachings of the *Nori et al.* patent. It is respectfully submitted that the *Nori* patent does not have any relationship to the subject matter of the *Dillingham* patent, and therefore it would not be obvious for a person of ordinary skill in the art to combine their teachings.

As discussed previously, the *Dillingham* patent is concerned with a web site administrator's ability to remotely browse and configure the directory of a web server. In contrast, the *Nori* patent is directed to the ability to perform operations on large objects in a database system. The Office Action does not identify any relationship between these two disparate disclosures. If a person of ordinary skill in the art is concerned with the ability to remotely browse a web server, why would such a person refer to a reference having to do with database systems? The Office Action cites the *Nori* patent for its disclosure of a "snapshot-id" in connection with a large object locator. However, the Office Action does not identify any nexus between this disclosure and the subject matter of the *Dillingham* patent. It is respectfully submitted that the citation of the *Nori* patent is based upon hindsight knowledge of the present invention, rather than any teachings that would motivate a person of ordinary skill in the art to combine it with the *Dillingham* patent.


For this additional reason, therefore, it is respectfully submitted that the subject matter of claims 8 and 15, as well as their dependent claims 9 and 16, respectively, is not suggested by the references.

For the foregoing reasons, it is respectfully submitted that all pending claims are patentably distinct from the prior art of record. Reconsideration and withdrawal of the rejections are therefore respectfully requested.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

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By: 
James A. LaBarre
Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620